

Web Integrity Project Launch Plan

February 2, 2017

Mission

The Web Integrity Project (WIP) is launching as a program of the Sunlight Foundation to monitor changes to government websites, holding our government accountable by revealing shifts in public information and resources, as well as changes in stated policies and priorities. We will work with journalists to make our findings public, and we will produce policy analyses to evaluate Web governance practices and help ensure access to valuable Web resources.

Our Work

Our work will build on our Founders' experience monitoring and analyzing changes to federal websites [as Sunlight Fellows over the past year](#) and at the [Environmental Data & Governance Initiative](#) (EDGI). This work will include two main components: 1) We will monitor key websites on a regular basis and publish reports based on important identified changes. 2) We will analyze, investigate, and contextualize reported changes, generating research analyses and policy recommendations. This work will inform recommendations we will generate for best practices for documenting and promoting public understanding of changes and for how the government can best guarantee sustained access to Web resources.

Website Monitoring

Website monitoring is conducted using software that finds changes to websites. Our staff and volunteers will track and identify important changes, and we will write and publish reports on these changes that we will disseminate to journalists. We will also be working to compile all of the changes we find and write about into a centralized tracker.

Monitoring Work: Our staff will systematically monitor government Web domains for important changes in language and access to information on individual webpages. To enhance our staff capacity, we are recruiting and will coordinate a team of volunteer analysts.

Report Writing: Upon identifying significant website changes, we will write and carefully vet technical reports, describing what has been altered, specifying the date ranges for changes, coding changes using our Founders' [classification of changes to government websites](#),¹ and providing references so the public can verify and better understand the context of the change.

Website Change Tracker: Website monitoring reports, news media articles, and other resources documenting changes to government websites will all be vetted and compiled in a centralized tracker. Entries in the tracker will be coded based on the [classification of changes to government websites](#), topic matter, and other fields to allow the public and media to comprehensively understand how websites are changing across the federal government.

¹ Rinberg, T. and Bergman, A., "[How to classify changes to government websites](#)," Sunlight Foundation, Oct. 5, 2017.

Publishing and Outreach: We will publish our website monitoring reports and the Website Change Tracker on WIP's section of Sunlight's website (the new tracker will be an expanded version of [Sunlight's current data removal tracker](#)). To disseminate our findings to the public and key stakeholders, we will source a pool of journalists who will receive embargoed versions of our reports for further analysis and investigation. Working with partner journalists bolsters our investigative capacity and allows us to better communicate to the public.

Analysis and Recommendations

Beyond the technical work of monitoring changes to websites, we will also analyze changes, as well as agency Web governance practices, which will serve as a basis for recommendations regarding how agencies should manage and document changes to Web information and resources. This work will be done in close collaboration with partner organizations, listed below.

Trend Analysis: Building on our website monitoring reports and continued monitoring of domains, we will write blog posts that document and contextualize patterns and themes of changes to agency websites. The analyses will explore systematic shifts in language, repeated similar changes in access to information, and agency communication practices. These analyses will be similar to our recent [Sunlight Foundation blog post](#) about how agencies have been removing Web content without proactively communicating these removals to the public.²

Web Governance Policy Analysis: In addition to analyzing trends in the changes themselves, we will investigate agency Web governance practices and contextualize how laws, regulations, and guidance for Web records management apply to the website changes we are documenting. In particular, we will explore connections to the Federal Records Act, Paperwork Reduction Act, Office of Management and Budget website guidance, internal agency records guidance, and the National Archives and Records Administration (NARA) [Guidance on Managing Web Records](#). We will continue to develop the [classification of changes to government websites](#) to improve our ability to accurately identify and communicate about website changes. We will also analyze how website changes impact the public's capacity to benefit from or understand the government's work and engage in democratic processes, like notice-and-comment rulemaking

Agency Recommendations: Building on the [classification of changes to government websites](#), we will work to develop a framework for agencies to decide what Web records to archive and when, how to log changes, and how to promote public understanding of changes and sustained access to valuable resources through communication practices. This framework will directly inform NARA's ongoing efforts to update its [2005 Guidance on Managing Web Records](#).

Publishing and Outreach: Blog posts, white papers, and any other analysis content will be published on WIP's section of Sunlight's website and within other sections. We will also continuously share our analysis findings with our journalist pool and key stakeholders.

² Rinberg, T. and Bergman, A., "[How federal agencies are quietly removing government Web resources, and why it matters](#)," Sunlight Foundation, Nov. 15, 2017.

Subjects and Focus

Health and Healthcare: After extensive research into agency organization and Web resources, we have begun monitoring the websites of several agencies and offices under the Department of Health and Human Services. Our efforts currently focus on webpages and resources related to sexual and reproductive health, LGBTQ health, the Affordable Care Act, Medicare and Medicaid access, and health research. We are currently monitoring 10,000 such webpages.

Environment, Climate, and Energy: Our Founders' [website monitoring work at EDGI](#) focuses on environment, climate, and energy Web domains. We will continue working and coordinating with EDGI to make sure that we are most effectively spanning agency websites and not duplicating efforts. In addition, we will add capacity to help EDGI in analyzing agency Web governance and shifts in agency presentation of information.

Upcoming Areas of Focus: In the coming months, we will research Web resources and begin expanding our website monitoring efforts to other subject areas, including immigration, civil rights, criminal justice, international relations, and others.

Roles and Responsibilities

Director (Toly Rinberg): Will lead the organization's efforts to hold the government accountable to the public for its Web presence. Will oversee all hiring, as well as the on-boarding and work of new employees and volunteer monitoring analysts. Will write and vet reports about website changes and coordinate trend and Web governance analyses.

Director of Programs (Rachel Bergman): Will oversee the organization's monitoring efforts. Will lead research and monitoring of agency websites and directly coordinate the work of the Senior Investigator, Website Monitoring Analyst, and volunteer monitoring analysts. Will write and vet reports on website changes and coordinate public and media outreach for releases.

Senior Investigator (Forthcoming Hire): Will research agency websites and monitor key websites for changes. Will write reports on important changes, work with journalists to disseminate findings, lead trend and Web governance analyses, and lead efforts to investigate agency decision-making. Will contribute to efforts to expand monitoring to other subject areas.

Website Monitoring Analyst (Forthcoming Hire): Will research agency websites and monitor key websites for changes. Will write reports on important changes, work with journalists to disseminate findings, and contribute to trend and Web governance analyses. Will contribute to efforts to expand monitoring to other subject areas.

Director of Policy (Andrew Bergman): Will research how laws, regulations, and guidance for Web records management apply to observed website changes. Will oversee the drafting of recommendations for future guidance on best practices for how agencies should provide notice for website changes, log them, and create a Web archive. Will vet website monitoring reports.

Governance and Integration with Sunlight

As a program within the Sunlight Foundation, WIP will be governed as a part of the organization by Sunlight's current Board, Executive Director, and leadership team. WIP's operations will be lead by the Founders and Directors of the program, Toly Rinberg (Director), Rachel Bergman (Director of Programs), and Andrew Bergman (Director of Policy).

Rachel, Andrew, and Toly will also continue to work closely with current Sunlight staff to conduct analyses and produce recommendations for government agencies, like their recent letter about the upcoming update to NARA's Guidance on Managing Web Records.³

Proposed Partnerships and Collaborations

Continuing and expanding on current partnerships of the Sunlight Foundation, we plan to collaborate with a number of other organizations, listed below, partnerships that stem from our Founders' previous website monitoring and analysis work.

Environmental Data & Governance Initiative (EDGI): As two of the leaders of EDGI's volunteer website monitoring efforts, Toly and Andrew will continue to work in their roles as part of the EDGI team, writing and vetting website monitoring reports about environmental and climate Web resources and analyzing changes that have occurred.

Internet Archive (IA): We will continue our Founders' collaboration with IA and the staff operating their Wayback Machine to nominate important webpages for archiving. We will also continue to collaborate on best practices for archiving and classifying changes to websites.

Union of Concerned Scientists (UCS): As one of the leaders of Protecting Science for the Public Good (ProSci), a group which UCS convenes, Andrew will continue to work closely with the staff of the UCS Center for Science and Democracy to learn about changes to Web resources that they and their network have seen and to conduct evidence-based analyses. UCS and ProSci will also serve as the core of a network that will disseminate our work to partners.

OpenTheGovernment (OTG): We hope to continue our Founders' collaboration with OTG staff on important policy recommendations, like the letter mentioned above that was drafted and cosigned by OTG, Sunlight, and the American Libraries Association.

American Libraries Association (ALA): As with OTG, we hope to continue our Founders' collaboration with ALA staff on policy recommendations, like the letter mentioned above.

Project on Government Oversight (POGO): As POGO's Special Environmental Advisor, Andrew will continue to work closely with POGO staff who are documenting changes to Web resources to consider how to best describe findings and conduct policy analyses.

³ Sunlight Foundation, OpenTheGovernment, American Libraries Association to U.S. Chief Records Officer, Laurence Brewer, NARA, "[Improving Management of Federal Web Records](#)," Nov. 14, 2017.

Website Integrity Project Short- and Medium-Term Goals

The goals below are compiled from the above proposal and provide an overview of the initiatives and deliverables that WIP will achieve in the coming months.

Pre-Launch, Launch, and Immediate Post-Launch (Dec 2017 - Feb 2018):

Website monitoring:

- Establish comprehensive monitoring of health and healthcare federal Web domains
- Deploy WIP's database to store webpage snapshots for all monitored domains
- Recruit at least 3-5 volunteer analysts to monitor health and healthcare domains
- Make hires for Website Monitoring Analyst and Senior Investigator positions
- On an ongoing basis, write and vet reports based on important identified changes (primarily focusing on health and healthcare issues) and work with journalists and civil society groups to disseminate findings
- Conduct retrospective analysis of key webpages and domains
- Launch and continuously update the Website Change Tracker, which will list all documented significant changes to federal websites since the beginning of 2017
- Begin research into federal website content on immigration, civil rights, criminal justice, international relations, and other topics, and begin expanding monitoring efforts

Analysis and Recommendations:

- On an ongoing basis, analyze website change trends and research Web governance practices, and publish findings as blog posts on the Sunlight Foundation website
- On an ongoing basis, conduct investigations into agency decision-making and practices
- Assist NARA in developing an update to its Guidance on Managing Web Records

Medium-term (March 2018 - May 2018):

Website Monitoring:

- Establish comprehensive monitoring of federal Web domains on two additional subjects
- Recruit additional volunteer analysts as needed to monitor new domains
- Continue to maintain WIP's database of webpage snapshots and make plans to begin use of EDGI's [custom website monitoring software](#)
- On an ongoing basis, write and vet reports based on important identified changes (across all monitored topics), and work with journalists and civil society groups to disseminate findings
- Conduct retrospective analysis on newly monitored domains
- Continuously update the Website Change Tracker

Analysis and Recommendations (Same as above)

Future goals (June 2018 and afterward):

- Conduct comprehensive evaluation of progress, reassess future directions, and publish a new program plan